

Exhibit

B

1 And it says, "It has been a wonderful to have
2 Edward grow and become our most capable vice president."
3 Are you vice president?
4 A I use that title at times but I consider myself
5 general manager.
6 Q This -- the front page that I was provided said
7 1997. Is this still the company employment manual used
8 today?
9 A Yes.
10 Q Now, on the second page of the company history
11 that you had referenced, the page, the locations --
12 A Um-hum.
13 Q That's a yes? We can't do "um-hum." That's why
14 I corrected you. Didn't mean to be rude.
15 A Repeat the question, please.
16 Q Okay. On the second page of company history, the
17 continuation, it speaks of a Specialized Medical Devices.
18 Is that an offshoot of HDJ Company?
19 A At the time of conception, no.
20 Q Is it today?
21 A Maybe want to clarify "offshoot."
22 Q Let me ask it in a different way. What is
23 Specialized Medical Devices?
24 A It's a company that provides products and
25 services mostly geared toward the medical industry.

13

1 Q And those products -- are those products
2 manufactured at HDJ?
3 A HDJ is one of the suppliers of Specialized
4 Medical Devices. One of many.
5 Q And where is Specialized Medical Devices located?
6 A 300 Running Pump Road.
7 Q And that being the same facility of HDJ?
8 A They are both in the same facility, yes.
9 Q What is your position with Special Medical
10 Devices?
11 A My title would be -- it is vice president.
12 Q Is Mary Burton president of Special Medical?
13 A Yes.
14 Q What about Butron Enterprises?
15 A Butron.
16 Q What's it called?
17 A Butron.
18 Q Butron. I'm sorry. Is that also a company owned
19 by Mary Burton?
20 A She is an owner.
21 Q Is there more than one owner?
22 A Yes.
23 Q Are you an owner?
24 A Yes.
25 Q And other than Mary and yourself, are there any

14

1 other owners?
2 A Yes.
3 Q And who are they?
4 A Mary D. S. Burton.
5 Q Is that your sister?
6 A Yes.
7 Q And what does Butron Enterprises -- what is their
8 purpose?
9 A They are a minority-based contracting company.
10 Q And what kind of goods do they contract or
11 service? Is it goods or services?
12 A It's goods.
13 Q What type of goods?
14 A Machine parts.
15 Q Are those machine parts manufactured by HDJ?
16 A Some of those parts are machined by HDJ.
17 Q Can you spell Butron for me, please?
18 A B-u-t-r-o-n.
19 Q And where is Butron Enterprises located?
20 A It is really a company on paper. But they do
21 work out of 300 Running Pump Road.
22 Q When was Butron Enterprises created?
23 A I'm not sure.
24 Q Was it before or after 1994?
25 A I'm not exactly sure.

15

1 Q And I guess where I am picking up the 1994, is
2 that the year that Specialized Medical Devices -- the
3 conception was 1994. So do you recall if it was before or
4 after Specialized Medical Devices?
5 A I don't recall specifically.
6 Q What is the interrelationship, then, between HDJ
7 and Butron Enterprises?
8 A HDJ is a supplier to Butron.
9 Q Does Butron Enterprises pay taxes?
10 A I believe so, yes.
11 Q And Special Medical Devices pays taxes, is that
12 correct, their own income tax?
13 A Actually, I believe it's an S corp, so I don't
14 believe that it does.
15 Q Are you a college graduate?
16 A I have an associate's degree.
17 Q So you are a high school graduate?
18 A Yes.
19 Q Lancaster County?
20 A Yes.
21 Q What -- which high school?
22 A Conestoga Valley.
23 Q And you have an associate's degree from where?
24 A Miami-Dade College.
25 Q What year?

16